

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 20, 2009.

Permit Number: **R30-05700011-2009 (Part 1 of 3)**
Application Received: **November 3, 2010**
Plant Identification Number: **05700011**
Permittee: **Alliant Techsystems, Inc.**
Facility Name: **ATK Missile Subsystems & Components Division**
Mailing Address: **210 State Route 956, Rocket Center, WV 26726-3548**

Permit Action Number: *MM01* Revised: *June 23, 2011*

Physical Location:	Rocket Center, Mineral County, West Virginia
UTM Coordinates:	686.47 km Easting • 4381.25 km Northing • Zone 17
Directions:	Left on plant access road from State Route 956 at the North Branch of the Potomac River

Facility Description

SIC Codes: Primary - 3764, Secondary – 3089

Fabrication of both steel and composite structure rocket motor and warhead cases, production of propellants and explosives which are loaded into above cases and all associated case preparation and testing for motors.

The facility is located at two plants - Plant 1 and Plant 2. For Title V Permit purposes the facility operations were divided into the following Parts:

Part 1 - Motor Manufacturing,

Part 2 - Composites Manufacturing and Metal Fabrication,

Part 3 - Miscellaneous Units.

This modification update is to increase the hourly emissions (VOC, PM and HAP) of the paint booths located in Bldg. 392 to allow for full unit painting if needed rather than just stenciling. Annual emissions would not change from those currently listed in the permit.

The emission changes under this minor modification are follows:

Criteria Pollutants	Change in PTE (Tons per year)
PM	0
HAP	0
VOC	0

With the proposed changes associated with this modification, this facility maintains the potential to emit over 122.12 tons per year of Carbon Monoxide, 124.29 tons per year of Nitrogen Oxides, 289.14 tons per year of Sulfur Dioxide, over 10 tons per year of each Hydrochloric Acid and Toluene, and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 25 tons per year of aggregate HAPs, Alliant Techsystems, Inc., ATK Missile Subsystems & Components Division is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

Federal and State:

Operating permit requirement.

No objectionable odors.
Toxic Air Pollutants

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1798B	2/17/2011	
R13-1455A	07/18/2001	
R13-0898B	04/27/2004	
R13-1694B	11/17/2003	
R13-2037A	07/26/2001	
R13-2246A	10/14/03	
R13-1782A	07/19/2001	
R13-0401B	05/23/2001	
R13-1047B	03/04/2002	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes have been made in Title V permit language.

- **45CSR42 – Greenhouse Gas Emissions Inventory Program.**
This facility is subject to 45CSR42. Refer to permit conditions 3.1.12 and 3.5.12 for the requirements pursuant to this rule. The language of the condition 3.5.12 is substantially that which is at 45CSR§42-4, with only revisions to referencing language and the word “Secretary” changed to “Director”.
- Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3. and 3.5.5.
- Section d. has been added to condition 3.3.1 to update boilerplate language.

This Title V Minor modification (MM01) includes the changes approved under R13-1798B, issued on February 17, 2011. The changes are as follows:

- Condition 6.1.1 has been updated to reflect combined emission limits for emission point ID's from R13-1798B and the addition of HAP emission limits.
- Condition 6.1.3 has been revised. Definition of coating was moved from 6.1.3 to 6.1.7 and condition A5 from R13-1798B was added to condition 6.1.3 of this permit.
- Condition 6.1.7 was added to establish the requirements on specific HAPs emission associated with the use of surface coating, consistent with current practice for coating sources to provide flexibility with coating formulations and manufacturers.
- Condition 6.1.8 was added to limit the maximum number of units to be painted on annual basis.
- Condition 6.4.1 has been revised. Term” VOC” was removed from emission records to include all regulated emission limits. Also, in the fourth line of this condition, term “VOCs” has been removed for the same reason. (That was an error in R13-1798B).
- Attachments A and D & Appendices B and C have been added to this permit.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule. The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A

Ending Date: N/A

All written comments should be addressed to the following individual and office:

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

None